

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
Nashville Division**

Victor Ashe, Phil Lawson, and the League of)
Women Voters of Tennessee,)

Plaintiffs,)

v.)

Tre Hargett, in his official capacity as)
Tennessee Secretary of State; Mark Goins, in)
his official capacity as Tennessee)
Coordinator of Elections; and Jonathan)
Skrmetti, in his official capacity as)
Tennessee Attorney General,)

Defendants.)

Case No. 3:23-cv-01256
Judge Eli J. Richardson
Magistrate Judge Alistair Newbern

DECLARATION OF PHIL LAWSON

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I am over the age of 18 years old, and I am otherwise competent to make this Declaration.

2. I am a real estate developer with a focus on providing affordable housing and a civic leader in East Tennessee.

3. I established the Lawson Family Foundation. It provides substantial economic support to renew urban centers and provide economic mobility to Tennessee's poorest residents; increase literacy, expand access to nutrition, facilitate pathways to college and careers for those traditionally unable to obtain those goals; and combat human trafficking and domestic violence.

4. I am also a significant donor to the University of Tennessee.

5. I consider myself to be a member of the Democratic Party and have voted in federal, state, and local elections, including Democratic primary elections, and intend to continue to do so in the future.

6. I am one of the largest donors to the Democratic Party in the State of Tennessee.

7. I have, at times, criticized the Democratic Party.

8. I have also donated money to and voted for Republican candidates, including conservative Republican Janet Testerman in her candidacy for the Tennessee General Assembly.

9. I am not certain, given the vague language of Tennessee Code Annotated Sections 2-7-115(b) and (c), the lack of clear definitions in the Tennessee Democratic Party bylaws, and today's changing political climate, that I can vote in the Democratic Primary without fear of prosecution for violating Section 2-7-115(b).

10. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6th day of December, 2023.

Phil Lawson
Phil Lawson